

SCPPA South Carolina Pulp & Paper Association

700 South Kaminski Street, Georgetown, SC 29440

January 7, 2009

Mr. L. Nelson Roberts, Jr.
SC DHEC
Bureau of Air Quality
2600 Bull Street
Columbia, SC 29201

AbitibiBowater
Inc.

Re: Ozone Nonattainment designation

Domtar

Dear Mr. Roberts:

International
Paper

KapStone

The following comments are provided on behalf of the South Carolina Pulp and Paper Association (SCPPA) whose members operate seven major manufacturing facilities in South Carolina and provide employment for over 13,000 South Carolinians. Comments provided in this submittal do not preclude member companies from submitting additional comments directly or through other associations with which they are affiliated. SCPPA appreciates the openness that DHEC has had in this process for determining what nonattainment boundary recommendations will be made to the EPA. The regional meetings and information shared on DHEC's website was extremely useful for all involved.

Sonoco

Smurfit-Stone
Container
Corporation

As a result of lowering the primary and secondary NAAQS for ground-level ozone to 0.075 parts per million, several areas of South Carolina have the potential for being designated non-attainment. It is imperative that DHEC use the flexibility allowed by EPA in designating the non-attainment boundaries. In the December 4, 2008 guidance issued by EPA for boundary designation, EPA states that "each potential nonattainment area should be evaluated on a case-by-case basis."

SCPPA recommends DHEC designate smaller boundaries like metropolitan planning organizations in determining non-attainment boundaries. Smaller areas provide opportunities for monitors that are less severe of a classification to reach attainment status independent of areas with monitors that are more severe. This will provide gateways of opportunity for economic growth and expansion. Areas that have a less severe monitor that are grouped with areas of a higher classification are penalized by being held to non-attainment requirements until the more severe monitors are in attainment. EPA recognizes that the use of presumptive boundaries for determining non-attainment areas is a starting point but that final determinations may be larger or smaller than the presumptive area starting point.

Environmental concern with a cooperative effort.

Mr. L. Nelson Roberts, Jr.

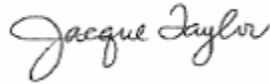
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SCPPA strongly recommends EPA and DHEC continue the use of Early Action Compacts (EAC). The EAC process allowed SC to achieve reductions in ozone precursors from a variety of sources that otherwise, may have not occurred. Meeting the lower 2008 8-hour ozone standard will again require a multitude of stakeholders from all backgrounds and businesses to be committed to achieving cleaner air sooner. The collaborative efforts to meet the new 2008 ozone standards before the anticipated federally mandated attainment date (2013), will encourage local areas within the state to design control strategies that best fit their specific needs. There is no reason not to accept a program that, albeit voluntary, has been proven successful in the past.

If you have any questions, please feel free to call me at (843) 545-2290 or electronically at jacquelyn.taylor@ipaper.com.

Sincerely,

A handwritten signature in cursive script that reads "Jacquelyn Taylor".

Jacquelyn Taylor
Chair, SC Pulp and Paper Association

cc: SCPPA Members